

SEALED

CLERK'S OFFICE U.S. DIST. COURT
AT ABINGDON, VA
FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION
October 2006 Session

OCT 31 2006

JOHN F. CORCORAN, CLERK
BY: *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA)

v.)

Criminal Number 7:06CR 00098

ROBERT KEITH ADAMS)

WILBERT HERMAN BROWN)

JASON ALLEN BURTON)

HAROLD FRANKLIN CASSELL)

CORNELIA BRYANT COX)

KANDY D. HUBBARD DESHAZO)

WALTER R. HAIRSTON)

JAMES HAROLD KEATON)

DAVID ALLAN KING)

GINGER RENEE LEWIS)

BRADLEY SCOTT MARTIN)

PATRICK DAVID MARTIN)

STEVEN VARION PRESTON)

WILLIAM RANDALL REED)

CARLTON ARNEZ RILEY)

MARK ANTHONY ROBERSON)

JONATHAN K. ROBERSON)

RONALD DEAN TRANTHAM)

JAMES ALDEN VAUGHT)

TRAVIS TODD WILKINS)

All in Violation of:

18 U.S.C. §1962(d) Racketeering Conspiracy
18 U.S.C. §4 Misprision of a Felony
18 U.S.C. §922(j) Poss. of Stolen Firearm
18 U.S.C. §922(k) Poss. of Firearm w/ Oblit. Ser. N
18 U.S.C. §922(o) Possession of Machinegun
18 U.S.C. §1001(a) False Statement to Fed. Agency
18 U.S.C. §1505 Obstruction of Justice
18 U.S.C. §1512(c) Obstruction of Justice
18 U.S.C. §1623(a) Perjury
18 U.S.C. §1956(a) Money Laundering
21 U.S.C. §841 Narcotics Distribution
21 U.S.C. §846 Conspiracy to Distrib. Narcotics
21 U.S.C. §846 Attempted Drug Offense
26 U.S.C. §5871 Poss. Unregistered Machinegun

INDICTMENT

INTRODUCTION TO THE INDICTMENT

At all times relevant to this Indictment:

1. Henry County, Virginia is located along the North Carolina border in the Southern Piedmont region of the Commonwealth of Virginia. Henry County is approximately 382 square miles with a estimated population of 58,000.

2. The Henry County Sheriff's Office (hereinafter referred to as the "HCSO") is

comprised of approximately 122 employees – including 96 sworn law enforcement officers. The HCSO is responsible for law enforcement, civil process, court security, and supervision of the county jail in Henry County, Virginia. The HCSO is divided into four divisions – Administrative, Corrections, Investigations and Patrol. Each division is supervised by a Lieutenant, who in turn is supervised by the Captain. The Captain reports to the Major, who reports directly to the Sheriff. Since 1992, the elected sheriff of Henry County, Virginia has been HAROLD FRANKLIN CASSELL. The current major for the HCSO is JAMES HAROLD KEATON.

3. Sworn officers, employees, and associates of the HCSO, both known and unknown to the Grand Jury, engaged in a continuous scheme to distribute illegal drugs and narcotics – both using their connections with the HCSO to obtain drugs and narcotics and avoid detection and arrest; and to obtain and distribute illegal drugs and narcotics separate and apart from their connections with the HCSO.

A. THE CRIMINAL DEFENDANTS

4. ROBERT KEITH ADAMS was employed as a Sergeant with the Henry County Sheriff's Office.

5. WILBERT HERMAN BROWN was a private citizen engaged in drug dealing activities.

6. JASON ALLEN BURTON was employed as a Deputy with the Henry County Sheriff's Office.

7. HAROLD FRANKLIN CASSELL was employed as the Sheriff of the Henry County Sheriff's Office.

8. CORNELIA BRYANT COX was employed as a Deputy with the Henry County Sheriff's Office.

9. KANDY D. HUBBARD DESHAZO was an employee of the United States Postal Service.

10. WALTER R. HAIRSTON was employed as a Deputy with the Henry County Sheriff's Office.

11. JAMES HAROLD KEATON was employed as a Captain and is the current Major with the Henry County Sheriff's Office.

12. DAVID ALLAN KING was employed as a Vice Officer and a School Resource Officer with the Henry County Sheriff's Office.

13. GINGER RENEE LEWIS was a private citizen engaged in drug dealing activities.

14. BRADLEY SCOTT MARTIN was employed as a Deputy with the Henry County Sheriff's Office.

15. PATRICK DAVID MARTIN was employed as a Sergeant and Vice Officer with the Henry County Sheriff's Office.

16. STEVEN VARION PRESTON was employed as a Deputy with the Henry County Sheriff's Office.

17. WILLIAM RANDALL REED was a private citizen engaged in drug dealing activities.

18. CARLTON ARNEZ RILEY was employed as a state probation officer in Henry County, Virginia.

19. MARK ANTHONY ROBERSON was a private citizen engaged in the possession and transfer of a firearm with an obliterated serial number.

20. JONATHAN K. ROBERSON was employed as a Deputy with the Henry County Sheriff's Office.

21. RONALD DEAN TRANTHAM was a private citizen engaged in drug dealing activities.

22. JAMES ALDEN VAUGHT was employed as a Sergeant with the Henry County Sheriff's Office.

23. TRAVIS TODD WILKINS was employed as a Vice Officer with the Henry County Sheriff's Office.

24. That the official proceedings involved in this Indictment, as that term is defined in Title 18, United States Code, Section 1512(f) & (g), were federal investigations into corrupt activities by employees and associates of the Henry County Sheriff's Office, including but not limited to, distribution and attempted distribution of illegal drugs; theft of property under the care, custody and control of the Henry County Sheriff's Office; embezzlement; and, the cover up and obstruction of the investigations by false statements,

perjury and by corrupt attempts to obstruct, influence or impede the investigations.

B. THE INVESTIGATION

25. On or about March 4, 2005, agents from the Drug Enforcement Administration (DEA) – Philadelphia Field Division, notified agents of the DEA – Roanoke Residence Office, that an express mail package containing two kilograms of Ketamine was being delivered to a residence in Martinsville, Virginia. Ketamine is a sedative/date rape Schedule III controlled substance. DEA agents intercepted the package of Ketamine and conducted an undercover controlled delivery of the Ketamine to the Martinsville residence. Once the controlled delivery was conducted, DEA agents arrested WILLIAM RANDALL REED and charged him with illegal possession with the intent to distribute Ketamine.

26. WILLIAM RANDALL REED agreed to talk to investigators and told them that he had brokered at least seven Ketamine transactions utilizing the Martinsville residence. WILLIAM RANDALL REED admitted that he was the middleman who received the illegal narcotics and money from an address outside the Commonwealth of Virginia, took his “cut”, and then shipped the remaining narcotics to another residence outside Virginia. The Martinsville residence was a rental property owned by JAMES ALDEN VAUGHT, a Sergeant with the HCSO. According to WILLIAM RANDALL REED, he paid JAMES ALDEN VAUGHT in both cash and Ketamine to use his Martinsville residence as a drug drop. WILLIAM RANDALL REED also assisted JAMES ALDEN VAUGHT in selling two kilograms of cocaine that JAMES ALDEN VAUGHT had seized from a drug dealer while

on duty with the HCSO. WILLIAM RANDALL REED also told investigators that BRADLEY SCOTT MARTIN, a Deputy with HCSO, had been jointly using and selling Ketamine and steroids for approximately eight years. Federal authorities arrested WILLIAM RANDALL REED in March, 2005.

27. JAMES ALDEN VAUGHT resigned from the HCSO in March, 2005, and in July, 2005, agreed to cooperate with federal investigators. As a part of the investigation, JAMES ALDEN VAUGHT spoke to investigators about his role in these offenses and agreed to covertly record conversations with many of the listed defendants in this Indictment.

28. JAMES ALDEN VAUGHT confirmed the allegations made by WILLIAM RANDALL REED and further revealed that the Martinsville residence was also used by several officers of the Henry County Sheriff's Office as a place for extra marital sexual relations. JAMES ALDEN VAUGHT stated that he, BRADLEY SCOTT MARTIN, and DAVID ALLAN KING, a vice officer and school resource officer with the HCSO, engaged in several illegal transactions involving the distribution of cocaine, cocaine base, marihuana and steroids.

C. THE CRIMINAL ACTIVITY

The following allegations constitute some, but not all, of the corrupt and illegal activities of members of HCSO and their associates:

29. DAVID ALLAN KING, who once was in charge of the HCSO vice unit, took drugs that had been seized by HCSO, falsified destruction orders for the drugs, and then sold

the stolen contraband through JAMES ALDEN VAUGHT to WILBERT HERMAN BROWN, RONALD DEAN TRANTHAM, WILLIAM RANDALL REED and others for further illegal distribution. It is estimated that this portion of the conspiracy involved multiple kilograms of cocaine, ounces of cocaine base (also known as “crack”), and hundreds of pounds of marihuana.

30. WALTER R. HAIRSTON was the canine handler for HCSO. WALTER R. HAIRSTON periodically received seized cocaine and marihuana from the HCSO to train the drug smelling dogs. On approximately ten occasions, WALTER R. HAIRSTON illegally took the seized cocaine and marihuana and gave the narcotics to JAMES ALDEN VAUGHT, who then gave the drugs to RONALD DEAN TRANTHAM for further illegal distribution.

31. BRADLEY SCOTT MARTIN and WILLIAM RANDALL REED routinely received steroids and prescription pills from an individual known as “Jose”, who lived in Mexico, through the United States mail. BRADLEY SCOTT MARTIN and WILLIAM RANDALL REED used steroids and sold them to various people at the local gyms, including WALTER R. HAIRSTON and STEVEN VARION PRESTON of the HCSO and other persons not charged in this Indictment.

32. CORNELIA BRYANT COX, JAMES HAROLD KEATON, DAVID ALLAN KING and PATRICK DAVID MARTIN stole firearms, money and other items of evidence that had been seized during criminal investigations conducted by the HCSO.

33. ROBERT KEITH ADAMS, WILBERT HERMAN BROWN, HAROLD

FRANKLIN CASSELL, CORNELIA BRYANT COX, KANDY D. HUBBARD DESHAZO, WALTER R. HAIRSTON, JAMES HAROLD KEATON, DAVID ALLAN KING, BRADLEY SCOTT MARTIN, STEVEN VARION PRESTON and RONALD DEAN TRANTHAM attempted to influence, impede and obstruct the federal investigation in this case by making false statements to federal agents; by encouraging others to make false statements; by committing perjury before the Federal Grand Jury; by passing on law enforcement information as to allow co-defendants to avoid apprehension; and, by violating their oaths as law enforcement officers by ignoring and encouraging illegal activities.

34. In 2001, a DEA agent from Texas placed a telephone call to the HCSO and advised that a drug ledger had been seized which indicated shipments of drugs were being delivered to a "Brad Martin's" house in Martinsville, Virginia. DEA did not realize that "Brad Martin" was a Deputy with HCSO. BRADLEY SCOTT MARTIN took the call and shared this bit of information with DAVID ALLAN KING and JAMES ALDEN VAUGHT. Sheriff HAROLD FRANKLIN CASSELL was advised of this illegal activity and chose not to take any action.

35. Sheriff HAROLD FRANKLIN CASSELL was advised of various illegal activities involving HCSO Deputies, including, but not limited to, the distribution of approximately two kilograms of cocaine by JAMES ALDEN VAUGHT and others; the embezzlement of money by JAMES ALDEN VAUGHT; and, the use of steroids by several members of HCSO. HAROLD FRANKLIN CASSELL covered up these illegal activities

by failing to pursue investigations; by agreeing to disclose sensitive law enforcement information to the offending parties in order for them to avoid detection and arrest; by making false statements to federal investigators and the Virginia State Police; and, by attempting to aid JAMES ALDEN VAUGHT in a money laundering scheme to disguise the source of monies represented to have been derived from the distribution of cocaine.

36. JASON ALLEN BURTON, JONATHAN K. ROBERSON and TRAVIS TODD WILKINS, who were all employed by HCSO, along with MARK ANTHONY ROBERSON, possessed, concealed and transferred an unregistered, short barrel machinegun with an obliterated serial number.

COUNT ONE
(Conspiracy to Commit Racketeering)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated into this Count of the Indictment.

The Criminal Enterprise

2. At various times relevant to this Indictment, WILBERT HERMAN BROWN, WALTER R. HAIRSTON, DAVID ALLAN KING, BRADLEY SCOTT MARTIN, WILLIAM RANDALL REED, RONALD DEAN TRANTHAM and JAMES ALDEN VAUGHT, the defendants, and others known and unknown to the Grand Jurors, were members and associates of a criminal organization whose members and associates engaged

in acts of drug distribution and obstruction of justice.

3. This criminal enterprise, including its leadership, membership and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1961(4), that is a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise was engaged in, and its activities affected, interstate commerce.

Purposes Of The Enterprise

4. The purposes of the enterprise included, among other things, the following:
- a. To enrich the members and associates of the enterprise through, among other things, the distribution of controlled substances and theft.
 - b. To promote and enhance the enterprise and its members’ and associates’ activities.
 - c. To steal and convert to the members and associates own use items under the care, custody and control of the Henry County Sheriff’s Office, including but not limited to, controlled substances, money, firearms, electronic equipment, automotive tools and lawnmowers.
 - d. To steal and convert to the members and associates own use items under the care, custody and control of private citizens, including but not limited to, controlled substances.

- e. To use the United States Postal Service to acquire and distribute controlled substances.
- f. To use contacts with the Henry County Sheriff's Office to protect, conceal and cover up the illegal drug dealing and theft activities by members and associates of the enterprise.
- g. To falsify and withhold evidence from federal investigators and the Federal Grand Jury in an attempt cover up illegal activities and avoid apprehension.

Means and Methods of the Enterprise

5. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:
- a. Members of the enterprise and their associates distributed and conspired to knowingly, intentionally and unlawfully distribute a mixture or substance containing cocaine, a Schedule II controlled substance; knowingly, intentionally and unlawfully distribute an unknown quantity of a mixture or substance containing cocaine base, a Schedule II narcotic controlled substance; knowingly, intentionally and unlawfully distribute a mixture or substance containing marihuana, a Schedule I controlled substance; knowingly, intentionally and unlawfully distribute a mixture or substance containing anabolic

steroids, a Schedule III controlled substance; and, knowingly, intentionally and unlawfully distribute a mixture or substance containing ketamine, a Schedule III controlled substance.

- b. Members of the enterprise and their associates committed acts of obstruction of justice, false statements and intimidation to conceal illegal activities and to avoid apprehension.
- c. Members of the enterprise and their associates committed acts of theft.

The Racketeering Conspiracy

6. From in or about 1998 until the date of the return of this Indictment, in the Western Judicial District of Virginia and elsewhere, WILBERT HERMAN BROWN, WALTER R. HAIRSTON, DAVID ALLAN KING, BRADLEY SCOTT MARTIN, WILLIAM RANDALL REED, RONALD DEAN TRANTHAM and JAMES ALDEN VAUGHT, the defendants, and others known and unknown to the Grand Jurors, being persons employed by and associated with the enterprise, which was engaged in, and the activities of which affected, interstate commerce, knowingly and intentionally conspired to violate Title 18, United States Code, Section 1962(c), that is to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts indictable under the following provisions of federal law:

- a. Title 21, United States Code, Section 846 (Conspiracy to Distribute Controlled Substances).
- b. Title 21, United States Code, Section 846 (Attempted Possession with Intent to Distribute and Attempted Distribution of Controlled Substances).
- c. Title 21, United States Code, Section 841 (Possession with Intent to Distribute and Distribution of Controlled Substances).
- d. Title 18, United States Code, Section 1503 (Endeavoring to Influence, Obstruct or Impede the Due Administration of Justice).
- e. Title 18, United States Code, Section 1512(c)(2) (Obstruction of Justice).

7. That it was a further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

8. All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO
(Conspiracy to Illegally Distribute Steroids and Ketamine)

The Grand Jury charges:

1. That the Introduction to the Indictment and Counts Three through Six of this Indictment are realleged and incorporated by reference into this Count.

2. That from on or about August 12, 1999, until in or about 2006, in the Western Judicial District of Virginia and elsewhere, DAVID ALLAN KING, GINGER RENEE LEWIS, BRADLEY SCOTT MARTIN, STEVEN VARION PRESTON, WILLIAM

RANDALL REED and JAMES ALDEN VAUGHT, the defendants, willfully and knowingly combined, conspired, confederated and agreed together, with each other and with diverse other persons known and unknown to the Grand Jurors to commit the following offenses against the United States, to wit: to knowingly, intentionally and unlawfully distribute a mixture or substance containing anabolic steroids and ketamine, both Schedule III controlled substances, in violation of Title 21, United States Code, Section 841.

3. That it was part of the conspiracy to use the United States Postal Service to transport and distribute the illegal drugs and money.

4. That it was part of the conspiracy to use residences in the Henry County area to receive and distribute the illegal drugs.

5. That it was part of the conspiracy to use contacts at the Henry County Sheriff's Office to avoid arrest and detection of illegal drug activity.

6. That it was part of the conspiracy to distribute the illegal drugs to members of the Henry County Sheriff's Office and others.

7. That in or about March 2005, in the Western Judicial District of Virginia, WILLIAM RANDALL REED knowingly, intentionally and unlawfully possessed with intent to distribute approximately two kilograms of a mixture or substance containing liquid ketamine.

8. All in violation of Title 21, United States Code, Section 846.

COUNT THREE

(Attempted Unlawful Possession with the Intent to Distribute Ketamine)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about December 16, 2003, in the Western Judicial District of Virginia and elsewhere, WILLIAM RANDALL REED knowingly, intentionally and unlawfully attempted to possess with intent to distribute approximately 100 vials/ampules of a mixture or substance containing ketamine, a Schedule III controlled substance.
3. All in violation of Title 21, United States Code, Section 846.

COUNT FOUR

(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about December 16, 2003, in the Western Judicial District of Virginia, BRADLEY SCOTT MARTIN and STEVEN VARION PRESTON, as principals and as aiders and abettors, corruptly obstructed, influenced and impeded an official proceeding, and attempted to do so; that is, an investigation by the United States Postal Service, in that BRADLEY SCOTT MARTIN and STEVEN VARION PRESTON, among

other things, knowingly and willfully informed William Randall Reed that they had received information through the Henry County Sheriff's Office that the United States Postal Service had intercepted a mailing of approximately 100 vials of liquid ketamine and planned to make a controlled delivery of the drugs to William Randall Reed and arrest him. As a result, William Randall Reed refused to accept delivery of the drugs and avoided arrest.

3. All in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

COUNT FIVE
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about December 16, 2003, in the Western Judicial District of Virginia, BRADLEY SCOTT MARTIN and STEVEN VARION PRESTON, as principals and as aiders and abettors, did corruptly influence, obstruct and impede the due and proper administration of the law involving a pending proceeding by an agency of the United States; that is, BRADLEY SCOTT MARTIN and STEVEN VARION PRESTON, among other things, knowingly and willfully informed William Randall Reed that they had received information through the Henry County Sheriff's Office that the United States Postal Service had intercepted a mailing of approximately 100 vials of liquid ketamine and planned to make a controlled delivery of the drugs to William Randall Reed and arrest him. As a result,

William Randall Reed refused to accept delivery of the drugs and avoided arrest.

3. All in violation of Title 18, United States Code, Sections 1505 and 2.

COUNT SIX
(Unlawful Possession with the Intent to Distribute Ketamine)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about March, 2005, until October 21, 2005, in the Western Judicial District of Virginia, GINGER RENEE LEWIS knowingly, intentionally and unlawfully possessed with intent to distribute approximately 32 vials/ampules of a mixture or substance containing liquid ketamine, a Schedule III controlled substance.
3. All in violation of Title 21, United States Code, Section 841.

COUNT SEVEN
(Money Laundering)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about February 24, 2006, in the Western Judicial District of Virginia, HAROLD FRANKLIN CASSELL, with the intent to conceal and disguise the

nature and source of property believed to be the proceeds of specified unlawful activity, did knowingly and willfully attempt to conduct a financial transaction affecting interstate commerce involving property represented to be the proceeds of specified unlawful activity by another person at the direction of, and with the approval of, a federal official authorized to investigate violations of Title 18, United States Code, Section 1956, to wit: HAROLD FRANKLIN CASSELL attempted to establish a means of giving drug proceeds the appearance of legitimacy by cosigning a loan for a person who possessed approximately \$10,000 in cash represented to be drug proceeds and then counseling the individual to deposit small amounts of the cash into a checking account to pay off the loan.

3. All in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT EIGHT
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about October, 2005, until in or about April, 2006, in the Western Judicial District of Virginia, defendant HAROLD FRANKLIN CASSELL corruptly attempted to obstruct, influence and impede an official proceeding; that is, investigations by the Federal Bureau of Investigation, the Drug Enforcement Administration and the Federal Grand Jury, in that HAROLD FRANKLIN CASSELL, among other things, counseled an

individual on methods of disguising, concealing, and laundering monies obtained through embezzlement and illegal drug distribution; agreeing with an individual never to mention the existence of monies derived from illegal drug distribution; made false statements to and attempted to mislead a Special Agent of the Federal Bureau of Investigation with respect to HAROLD FRANKLIN CASSELL's knowledge of money represented to have been derived by an individual of the Henry County Sheriff's Office through illegal means; and, made false statements to and attempted to mislead a Special Agent of the Federal Bureau of Investigation with respect to HAROLD FRANKLIN CASSELL's knowledge of an individual's illegal drug activities, said false statements were contained in a written report that was used during the federal investigation.

3. All in violation of Title 18, United States Code, Section 1512(c)(2).

COUNT NINE
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about October 2005 until in or about April 2006, in the Western Judicial District of Virginia, defendant HAROLD FRANKLIN CASSELL did corruptly endeavor to influence, obstruct and impede the due and proper administration of the law involving a pending proceeding by an agency of the United States; that is, investigations by

the Federal Bureau of Investigation and the Drug Enforcement Administration, in that HAROLD FRANKLIN CASSELL, among other things, counseled an individual on methods of disguising and concealing monies obtained through embezzlement and illegal drug distribution; agreeing with an individual never to mention the existence of monies derived from illegal drug distribution; made false statements to and attempted to mislead a Special Agent of the Federal Bureau of Investigation with respect to HAROLD FRANKLIN CASSELL's knowledge of money represented to have been derived by an individual of the Henry County Sheriff's Office through illegal means; and, made false statements to and attempted to mislead a Special Agent of the Federal Bureau of Investigation with respect to HAROLD FRANKLIN CASSELL's knowledge of an individual's illegal drug activities.

3. All in violation of Title 18, United States Code, Section 1505.

COUNT TEN
(False Statement to Federal Agent)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about March 22, 2006, in the Western Judicial District of Virginia, in a matter within the jurisdiction of the Federal Bureau of Investigation, HAROLD FRANKLIN CASSELL knowingly and willfully made a false material statement and representation to a Special Agent of the Federal Bureau of Investigation, in that HAROLD

FRANKLIN CASSELL stated that he had no knowledge of money represented to have been derived by an individual of the Henry County Sheriff's Office through illegal means, and that he had no knowledge of an individual's illegal drug activities, when in truth and fact, as HAROLD FRANKLIN CASSELL well knew, he did possess such knowledge.

3. All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT ELEVEN
(Misprision of a Felony)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.

2. That on or about March 22, 2006, in the Western Judicial District of Virginia, the defendant, HAROLD FRANKLIN CASSELL, having knowledge of the actual commission of a felony cognizable by a court of the United States; to wit, that James Alden Vaught had been involved in a conspiracy to violate the drug laws of the United States, did conceal the same by telling investigators that he did not believe Vaught was so involved, and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States.

3. In violation of Title 18, United States Code, Section 4.

COUNT TWELVE
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.

2. That from in or about August, 2005, until in or about June, 2006, in the Western Judicial District of Virginia, defendant DAVID ALLAN KING corruptly attempted to obstruct, influence and impede an official proceeding; that is, investigations by the Federal Bureau of Investigation, the Drug Enforcement Administration and the Federal Grand Jury, in that DAVID ALLAN KING, among other things, knowingly and willfully made agreements with potential witnesses to withhold evidence and present false evidence to federal investigators and the Federal Grand Jury; encouraged other potential witnesses to withhold and present false evidence to federal investigators and the Federal Grand Jury; and, made false statements to and attempted to mislead a Special Agent of the Federal Bureau of Investigation with respect to DAVID ALLAN KING's knowledge of illegal activities committed by himself and other employees of the Henry County Sheriff's Office, said false statements were contained in a written report that was used during the federal investigation.

3. All in violation of Title 18, United States Code, Section 1512(c)(2).

COUNT THIRTEEN
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about August, 2005, until in or about June, 2006, in the Western Judicial District of Virginia, defendant DAVID ALLAN KING did corruptly endeavor to influence, obstruct and impede the due and proper administration of the law involving a pending proceeding by an agency of the United States; that is, investigations by the Federal Bureau of Investigation and the Drug Enforcement Administration, in that DAVID ALLAN KING, among other things, knowingly and willfully made agreements with potential witnesses to withhold evidence and present false evidence to federal investigators; encouraged other potential witnesses to withhold and present false evidence to federal investigators; and, made false statements to and attempted to mislead a Special Agent of the Federal Bureau of Investigation with respect to DAVID ALLAN KING's knowledge of illegal activities committed by himself and other employees of the Henry County Sheriff's Office.
3. All in violation of Title 18, United States Code, Section 1505.

COUNT FOURTEEN
(False Statement to Federal Agent)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about March 23, 2006, in the Western Judicial District of Virginia, in a matter within the jurisdiction of the Federal Bureau of Investigation, DAVID ALLAN KING knowingly and willfully made a false material statement and representation to a Special Agent of the Federal Bureau of Investigation, in that DAVID ALLAN KING stated that he had no knowledge of illegal activities committed by employees of the Henry County Sheriff's Office, when in truth and fact, as DAVID ALLAN KING well knew, he did possess such knowledge.
3. All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT FIFTEEN
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about August, 2005, until in or about June, 2006, in the Western Judicial District of Virginia, defendant RONALD DEAN TRANTHAM corruptly

attempted to obstruct, influence and impede an official proceeding; that is, investigations by the Federal Bureau of Investigation, the Drug Enforcement Administration and the Federal Grand Jury, in that RONALD DEAN TRANTHAM, among other things, knowingly and willfully met with potential witnesses in the investigation to determine how to avoid detection; made a threat to shoot a potential witness in the investigation if that individual provided any information to investigators; and, made false statements to and attempted to mislead a Special Agent of the Drug Enforcement Administration with respect to RONALD DEAN TRANTHAM's knowledge of illegal activities committed by employees of the Henry County Sheriff's Office, said false statements were contained in a written report that was used during the federal investigation.

3. All in violation of Title 18, United States Code, 1512(c)(2).

COUNT SIXTEEN
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.

2. That from in or about August, 2005, until in or about June, 2006, in the Western Judicial District of Virginia, defendant RONALD DEAN TRANTHAM did corruptly endeavor to influence, obstruct and impede the due and proper administration of the law involving a pending proceeding by an agency of the United States; that is,

investigations by the Federal Bureau of Investigation and the Drug Enforcement Administration, in that RONALD DEAN TRANTHAM, among other things, knowingly and willfully met with potential witnesses in the investigation to determine how to avoid detection; made a threat to shoot a potential witness in the investigation if that individual provided any information to investigators; and, made false statements to and attempted to mislead a Special Agent of the Drug Enforcement Administration with respect to RONALD DEAN TRANTHAM's knowledge of illegal activities committed by employees of the Henry County Sheriff's Office.

3. All in violation of Title 18, United States Code, Section 1505.

COUNT SEVENTEEN
(False Statement to Federal Agent)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about May 31, 2006, in the Western Judicial District of Virginia, in a matter within the jurisdiction of the Drug Enforcement Administration, RONALD DEAN TRANTHAM knowingly and willfully made a false material statement and representation to a Special Agent of the Drug Enforcement Administration, in that RONALD DEAN TRANTHAM stated that he had no knowledge of illegal activities committed by employees of the Henry County Sheriff's Office, when in truth and fact, as RONALD DEAN

TRANTHAM well knew, he did possess such knowledge.

3. All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT EIGHTEEN
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.

2. That from in or about August, 2005, until in or about July, 2006, in the Western Judicial District of Virginia, defendant WILBERT HERMAN BROWN corruptly attempted to obstruct, influence and impede an official proceeding; that is, investigations by the Federal Bureau of Investigation, the Drug Enforcement Administration and the Federal Grand Jury, in that WILBERT HERMAN BROWN, among other things, knowingly and willfully met with potential witnesses in the investigation to determine how to avoid detection; and, made false statements to and attempted to mislead Special Agents of the Drug Enforcement Administration and the Federal Bureau of Investigation with respect to WILBERT HERMAN BROWN's knowledge of illegal activities committed by employees of the Henry County Sheriff's Office and other persons, said false statements were contained in a written report that was used during the federal investigation.

3. All in violation of Title 18, United States Code, Section 1512(c)(2).

COUNT NINETEEN
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about August, 2005, until in or about July, 2006, in the Western Judicial District of Virginia, defendant WILBERT HERMAN BROWN did corruptly endeavor to influence, obstruct and impede the due and proper administration of the law involving a pending proceeding by an agency of the United States; that is, investigations by the Federal Bureau of Investigation and the Drug Enforcement Administration, in that WILBERT HERMAN BROWN, among other things, knowingly and willfully met with potential witnesses in the investigation to determine how to avoid detection; and, made false statements to and attempted to mislead Special Agents of the Drug Enforcement Administration and the Federal Bureau of Investigation with respect to WILBERT HERMAN BROWN's knowledge of illegal activities committed by employees of the Henry County Sheriff's Office and other persons.
3. All in violation of Title 18, United States Code, Section 1505.

COUNT TWENTY
(False Statement to Federal Agent)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about July 11, 2006, in the Western Judicial District of Virginia, in a matter within the jurisdiction of the Federal Bureau of Investigation, WILBERT HERMAN BROWN knowingly and willfully made a false material statement and representation to a Special Agent of the Federal Bureau of Investigation and a Special Agent of the Drug Enforcement Administration, in that WILBERT HERMAN BROWN stated that he had no knowledge of illegal activities committed by employees of the Henry County Sheriff's Office, when in truth and fact, as WILBERT HERMAN BROWN well knew, he did possess such knowledge.
3. All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWENTY-ONE
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about August, 2005, until in or about April, 2006, in the

Western Judicial District of Virginia, defendant WALTER R. HAIRSTON corruptly attempted to obstruct, influence and impede an official proceeding; that is, investigations by the Federal Bureau of Investigation, the Drug Enforcement Administration and the Federal Grand Jury, in that WALTER R. HAIRSTON, among other things, knowingly and willfully agreed with a potential witness in the investigation to withhold evidence and provide false evidence; to direct one potential witness to make sure another potential witness in the investigations to withhold evidence and provide false evidence; and, made false statements to and attempted to mislead a Special Agent of the Federal Bureau of Investigation with respect to WALTER R. HAIRSTON's knowledge of illegal activities committed by employees of the Henry County Sheriff's Office and other persons, said false statements were contained in a written report that was used during the federal investigation.

3. All in violation of Title 18, United States Code, Section 1512(c)(2).

COUNT TWENTY-TWO
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about August, 2005, until in or about April, 2006, in the Western Judicial District of Virginia, defendant WALTER R. HAIRSTON did corruptly endeavor to influence, obstruct and impede the due and proper administration of the law

involving a pending proceeding by an agency of the United States; that is, investigations by the Federal Bureau of Investigation and the Drug Enforcement Administration, in that WALTER R. HAIRSTON, among other things, knowingly and willfully agreed with a potential witness in the investigation to withhold evidence and provide false evidence; to direct one potential witness to make sure another potential witness in the investigations to withhold evidence and provide false evidence; and, made false statements to and attempted to mislead a Special Agent of the Federal Bureau of Investigation with respect to WALTER R. HAIRSTON's knowledge of illegal activities committed by employees of the Henry County Sheriff's Office and other persons

3. All in violation of Title 18, United States Code, Section 1505.

COUNT TWENTY-THREE
(False Statement to Federal Agent)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about March 30, 2006, in the Western Judicial District of Virginia, in a matter within the jurisdiction of the Federal Bureau of Investigation, WALTER R. HAIRSTON knowingly and willfully made a false material statement and representation to a Special Agent of the Federal Bureau of Investigation, in that WALTER R. HAIRSTON stated that he had no knowledge of illegal activities committed by employees of the Henry

County Sheriff's Office, when in truth and fact, as WALTER R. HAIRSTON well knew, he did possess such knowledge.

3. All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWENTY-FOUR
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.

2. That from in or about August, 2005, until in or about June, 2006, in the Western Judicial District of Virginia, defendant BRADLEY SCOTT MARTIN corruptly attempted to obstruct, influence and impede an official proceeding; that is, investigations by the Federal Bureau of Investigation, the Drug Enforcement Administration and the Federal Grand Jury, in that BRADLEY SCOTT MARTIN, among other things, knowingly and willfully agreed with potential witnesses in the investigation to withhold evidence and provide false evidence; to direct potential witnesses to withhold evidence and provide false evidence; and, made false statements to and attempted to mislead a Special Agents of the Federal Bureau of Investigation and the Drug Enforcement Administration with respect to BRADLEY SCOTT MARTIN's knowledge of illegal activities committed by employees of the Henry County Sheriff's Office and other persons, said false statements were contained in a written report that was used during the federal investigation.

3. All in violation of Title 18, United States Code, Section 1512(c)(2).

COUNT TWENTY-FIVE
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about August, 2005, until in or about June, 2006, in the Western Judicial District of Virginia, defendant BRADLEY SCOTT MARTIN did corruptly endeavor to influence, obstruct and impede the due and proper administration of the law involving a pending proceeding by an agency of the United States; that is, investigations by the Federal Bureau of Investigation and the Drug Enforcement Administration, in that BRADLEY SCOTT MARTIN, among other things, knowingly and willfully agreed with potential witnesses in the investigation to withhold evidence and provide false evidence; to direct potential witnesses to withhold evidence and provide false evidence; and, made false statements to and attempted to mislead a Special Agents of the Federal Bureau of Investigation and the Drug Enforcement Administration with respect to BRADLEY SCOTT MARTIN's knowledge of illegal activities committed by employees of the Henry County Sheriff's Office and other persons.
3. All in violation of Title 18, United States Code, Section 1505.

COUNT TWENTY-SIX
(False Statement to Federal Agent)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That on or about May 30, 2006, in the Western Judicial District of Virginia, in a matter within the jurisdiction of the Federal Bureau of Investigation and the Drug Enforcement Administration, BRADLEY SCOTT MARTIN knowingly and willfully made a false material statement and representation to Special Agents of the Federal Bureau of Investigation and the Drug Enforcement Administration, in that BRADLEY SCOTT MARTIN stated that he was not involved in the distribution of approximately two kilograms of cocaine with an employee of the Henry County Sheriff's Office, when in truth and fact, as BRADLEY SCOTT MARTIN well knew, he was involved in such distribution.
3. All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWENTY-SEVEN
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about November, 2005, until in or about April, 2006, in the

Western Judicial District of Virginia, defendant JAMES HAROLD KEATON corruptly attempted to obstruct, influence and impede an official proceeding; that is, investigations by the Federal Bureau of Investigation, the Drug Enforcement Administration and the Federal Grand Jury, in that JAMES HAROLD KEATON, among other things, knowingly and willfully did not investigate criminal conduct in violation of his duties as a law enforcement officer; gave advice and counsel on methods of disguising embezzled monies as legitimate funds; made false statements to a Special Agent of the Federal Bureau of Investigation; and, made false statements to the Federal Grand Jury, said false statements were contained in a written report that was used during the federal investigation.

3. All in violation of Title 18, United States Code, 1512(c)(2).

COUNT TWENTY-EIGHT
(Obstruction of Justice)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from in or about November, 2005, until in or about April, 2006, in the Western Judicial District of Virginia, defendant JAMES HAROLD KEATON did corruptly endeavor to influence, obstruct and impede the due and proper administration of the law involving a pending proceeding by an agency of the United States; that is, investigations by the Federal Bureau of Investigation and the Drug Enforcement Administration, in that

JAMES HAROLD KEATON, among other things, knowingly and willfully did not investigate criminal conduct in violation of his duties as a law enforcement officer; gave advice and counsel on methods of disguising embezzled monies as legitimate funds; and, made false statements to a Special Agent of the Federal Bureau of Investigation.

3. All in violation of Title 18, United States Code, Section 1505.

COUNT TWENTY-NINE
(Perjury)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.
2. That from on or about April 4, 2006, in the Western Judicial District of Virginia, defendant JAMES HAROLD KEATON, while under oath and testifying in a proceeding before a Grand Jury of the United States for the Western Judicial District of Virginia, Abingdon Division, knowingly did make a false material declaration.
3. That at the time and place aforesaid the Grand Jury was conducting an investigation into corrupt activities of the Henry County Sheriff's Office constituting violations of Title 18, United States Code, Section 1962 (Racketeer Influenced and Corrupt Organizations) and other related federal statutes; that it was part of the investigation to elicit testimony concerning a conversation between JAMES HAROLD KEATON and James Alden Vaught relating to an attempt to conceal stolen money.

4. That at the time and place alleged, JAMES HAROLD KEATON, appearing as a witness under oath at a proceeding before the Grand Jury, knowingly made the following declarations in response to questions with respect to a material matter:

Q. What'd (sic) [Vaught] tell you about the money he had?

A. I mean I cut him off as quick as he had said that

Q. Well, did he ever indicate to you that he had money that was the result of a crime?

A. He didn't.

.....

Q. And did he ever talk to you about that he had some money that was from the crime, from a crime and nobody else knew about it?

A. No, sir. He – I didn't. No, sir, he didn't.

.....

Q. Right. But did he ever talk to you and say that, you know, I, I've paid the money back, but I've still got more money?

A. No, sir.

.....

Q. I mean did he ever ask you how would I explain this money if people ask about it or anything like that?

A. No, sir.

Q. Did you ever explain to him, you know, what he could do with the money, if somebody asked?

A. Absolutely not.

5. That the aforesaid testimony of JAMES HAROLD KEATON, as he then and there well knew and believed, was false.

6. All in violation of Title 18, United States Code, Section 1623.

COUNT THIRTY
(Possession of a Stolen Firearm)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.

2. That from in or about the mid-1990s until on or about October 5, 2006, in the Western Judicial District of Virginia, JAMES HAROLD KEATON knowingly possessed and concealed a stolen firearm; that is, a Marlin, Model 336, .30-30 caliber rifle, which had been shipped or transported in interstate commerce before it was stolen, knowing and having reasonable cause to believe the firearm was stolen.

3. All in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

COUNT THIRTY-ONE
(False Statement to Federal Agent)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.

2. That on or about March 24, 2006, in the Western Judicial District of Virginia, in a matter within the jurisdiction of the Federal Bureau of Investigation, ROBERT KEITH ADAMS knowingly and willfully made a false material statement and representation to a Special Agent of the Federal Bureau of Investigation, in that ROBERT KEITH ADAMS stated that he did not know why James Alden Vaught was attempting to locate Wilbert Herman Brown, when in truth and fact, as ROBERT KEITH ADAMS well knew, James Alden Vaught had told ROBERT KEITH ADAMS that he was attempting to locate Wilbert Herman Brown in order to sell him approximately ½ kilogram of cocaine.

3. All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT THIRTY-TWO
(Possession of a Stolen Firearm)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.

2. That from in or about the late 1990s until on or about April 6, 2006, in the Western Judicial District of Virginia, PATRICK DAVID MARTIN and CORNELIA BRYANT COX, as principles and as aiders and abettors, knowingly possessed and concealed approximately two stolen firearms; that is, a Smith & Wesson, Model 29-2, .44 caliber revolver, and a Colt Double Eagle, .45 caliber pistol, which had been shipped or transported in interstate commerce before they were stolen, knowing and having reasonable cause to

believe the firearms were stolen.

3. All in violation of Title 18, United States Code, Sections 2, 922(j), and 924(a)(2).

COUNT THIRTY-THREE
(Possession of a Stolen Firearm)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.

2. That from in or about the late 1990s until on or about April 6, 2006, in the Western Judicial District of Virginia, PATRICK DAVID MARTIN knowingly possessed and concealed a stolen firearm; that is, an Astra, Model A-100, .45 caliber pistol, which had been shipped or transported in interstate commerce before it was stolen, knowing and having reasonable cause to believe the firearm was stolen.

3. All in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

COUNT THIRTY-FOUR
(Possession of a Stolen Firearm)

The Grand Jury charges:

1. That the Introduction to the Indictment is realleged and incorporated by reference into this Count.